

UNITED STATES DISTRICT COURT
DISTRICT OF PUERTO RICO

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO,

as representative of

THE COMMONWEALTH OF PUERTO RICO, *et
al.*,

Debtors.¹

PROMESA

Title III

No. 17 BK 3283-LTS

(Jointly Administered)

**MOTION SUBMITTING CERTIFIED TRANSLATIONS IN CONNECTION WITH
DOCKETED CLAIM OBJECTION RESPONSES TO BE HEARD AT THE
JANUARY 19-20, 2022 ADJOURNED OBJECTION HEARING²**

To the Honorable United States District Judge Laura Taylor Swain:

The Financial Oversight and Management Board for Puerto Rico (the “Oversight Board”),

as the sole Title III representative of the Debtors pursuant to section 315(b) of the *Puerto Rico*

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (“Commonwealth”) (Bankruptcy Case No. 17-BK-3283-LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17-BK-3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17-BK-3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17-BK-3566-LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17- BK-4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”) (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

² Pursuant to the Court’s *Order Directing Redacted Filings* [ECF No. 19781], the Debtors hereby re-file the above-captioned motion, originally filed on January 5, 2022 [ECF No. 19670], with exhibits redacted for personally identifiable information, where necessary.

*Oversight, Management, and Economic Stability Act (“PROMESA”),*³ respectfully files this motion in compliance with the Court’s December 8, 2021 *Order Regarding Adjourned Omnibus Objections to Claims* [ECF No. 19461] (the “Adjourned Objection Hearing Procedures Order”) directing the Oversight Board to file (i) any responses that were not filed on the docket and/or (ii) certified translations of any Spanish-language responses to claims that the Debtors intend to prosecute at the hearing to be held on January 19-20, 2022. Adjourned Objection Hearing Procedures Order at 2.

Attached hereto as Exhibit 1 is a certified translation of the response [ECF No. 16345] (the “Lopez Valentin Response”), filed by Jose López Valentín (“López Valentín”), in response to the *Three Hundred First Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, the Employees Retirement System of the Government of the Commonwealth of Puerto Rico, and the Puerto Rico Highways and Transportation Authority to Miscellaneous Deficient Claims* [ECF No. 16021] (the “Three Hundred First Omnibus Objection”).

Attached hereto as Exhibit 2 is a certified translation of the response [ECF No. 17268] (the “Sepúlveda Torres Response”), filed by Maria Sepúlveda Torres (“Sepúlveda Torres”), in response to the Three Hundred First Omnibus Objection.

Attached hereto as Exhibit 3 is a certified translation of the response [ECF No. 18260] (the “Gonzalez Serrano Response”), filed by Zeidie W. Gonzalez Serrano (“Gonzalez Serrano”), in response to the Three Hundred First Omnibus Objection.

Attached hereto as Exhibit 4 is a certified translation of the response [ECF No. 16370] (the “Perez Rodriguez Response”), filed by claimant Maria Victoria Pérez Rodríguez (“Pérez Rodríguez”), to the *Three Hundred Fifth Omnibus Objection (Non-Substantive) of the*

³ PROMESA is codified at 48 U.S.C. §§ 2101–2241.

Commonwealth of Puerto Rico to Incorrect Debtor Claims [ECF No. 16023] (the “Three Hundred Fifth Omnibus Objection”).

Attached hereto as Exhibit 5 is a certified translation of the response [ECF No. 16346] (the “Flores Sánchez Response”), filed by claimant Carlos M. Flores Sánchez (“Flores Sánchez”), to the *Three Hundred Ninth Omnibus Objection (Substantive) of the Commonwealth of Puerto Rico to Claims that Are Partially Deficient and Partially Based on GDB Bonds* [ECF No. 16027] (the “Three Hundred Ninth Omnibus Objection”).

Attached hereto as Exhibit 6 is a certified translation of the response [ECF No. 16808] (the “Santiago Response”), filed by claimant Edgardo L. Santiago Santiago (“Santiago”), in response to the *Three Hundred Sixteenth Omnibus Objection (Substantive) of the Commonwealth of Puerto Rico, the Puerto Rico Highways and Transportation Authority, and the Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Misclassified Claims* [ECF No. 16643] (the “Three Hundred Sixteenth Omnibus Objection”).

Attached hereto as Exhibit 7 is a certified translation of the response [ECF No. 16868] (the “Díaz Chapman Response”), filed by claimant Sandra Díaz Chapman (“Díaz Chapman”), in response to the Three Hundred Sixteenth Omnibus Objection.

Attached hereto as Exhibit 8 is a certified translation of the response [ECF No. 16911] (the “Rivera Baez Response”), filed by claimant Edgardo Rivera Baez (“Rivera Baez”), in response to the Three Hundred Sixteenth Omnibus Objection.

Attached hereto as Exhibit 9 is a certified translation of the response [ECF No. 16956] (the “Herrera Bravo Response”), filed by claimant Debra A. Herrera Bravo (“Herrera Bravo”), in response to the Three Hundred Sixteenth Omnibus Objection.

Attached hereto as **Exhibit 10** is a certified translation of the response [ECF No. 17153] (the “Martínez Gómez Response”), filed by claimant Rosa Martínez Gómez (“Martínez Gómez”), in response to the Three Hundred Sixteenth Omnibus Objection.

Attached hereto as **Exhibit 11** is a certified translation of the response [ECF No. 17491] (the “Cabrera Velilla Response”), filed by claimant Carlos A. Cabrera Velilla (“Cabrera Velilla”), in response to the *Three Hundred Thirty-Seventh Omnibus Objection (Non-Substantive) of the Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Pension-Related Claims Asserted Against the Incorrect Debtor* [ECF No. 17081] (the “Three Hundred Thirty-Seventh Omnibus Objection”).

Attached hereto as **Exhibit 12** is a certified translation of the response [ECF No. 17269] (the “Morales Vázquez Response”), filed by Margarita Morales Vázquez (“Morales Vázquez”), in response to the Three Hundred Thirty-Seventh Omnibus Objection.

Attached hereto as **Exhibit 13** is a certified translation of the response [ECF No. 17475] (the “Tricoche Jesus Response”), filed by Luz N. Tricoche Jesus (“Tricoche Jesus”), in response to the Three Hundred Thirty-Seventh Omnibus Objection.

Attached hereto as **Exhibit 14** is a certified translation of the response [ECF No. 17327] (the “Rivera Domínguez Response”), filed by claimant Elizabeth Rivera Domínguez (“Rivera Domínguez”), in response to the *Three Hundred Forty-First Omnibus Objection (Non-Substantive) of the Puerto Rico Public Buildings Authority and the Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Cross-Debtor Duplicate Claims* [ECF No. 17105] (the “Three Hundred Forty-First Omnibus Objection”).

Attached hereto as **Exhibit 15** is a certified translation of the response [ECF No. 17383] (the “Mangual Flores Response”), filed by claimant Nilda Mangual Flores (“Mangual Flores”), in response to the Three Hundred Forty-First Omnibus Objection.

Attached hereto as **Exhibit 16** is a certified translation of the response [ECF No. 17440] (the “Colón Torres Response”), filed by claimant Neysha M. Colón Torres (“Colón Torres”), in response to (1) the Three Hundred Forty-First Omnibus Objection and (2) the *Three Hundred Forty-Fifth Omnibus Objection (Substantive) of the Commonwealth of Puerto Rico, the Puerto Rico Highways and Transportation Authority, and the Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Misclassified Claims* [ECF No. 17108] (the “Three Hundred Forty-Fifth Omnibus Objection”).

Attached hereto as **Exhibit 17** is a certified translation of the response [ECF No. 17441] (the “Landrau Rivera Response”), filed by claimant Zulma Landrau Rivera (“Landrau Rivera”), in response to the Three Hundred Forty-First Omnibus Objection.

Attached hereto as **Exhibit 18** is a certified translation of the response [ECF No. 17476] (the “Cabrera Torres Response”), filed by claimant Signa Magaly Cabrera Torres (“Cabrera Torres”), in response to (1) the Three Hundred Forty-First Omnibus Objection and (2) the Three Hundred Forty-Fifth Omnibus Objection.

Attached hereto as **Exhibit 19** is a certified translation of the response [ECF No. 17495] (the “González De León Response”), filed by claimant Ivette González De León (“González De León”), in response to (1) the Three Hundred Forty-First Omnibus Objection and (2) Three Hundred Forty-Fifth Omnibus Objection.

Attached hereto as **Exhibit 20** is a certified translation of the response [ECF No. 17603] (the “Benítez Delgado Response”), filed by claimant Ana Celia Benítez Delgado (“Benítez Delgado”), in response to the Three Hundred Forty-First Omnibus Objection.

Attached hereto as **Exhibit 21** is a certified translation of the response [ECF No. 17409] (the “Vázquez Pagán Response”), filed by claimant Ana Z. Vázquez Pagán (“Vázquez Pagán”), in response to the Three Hundred Forty-Fifth Omnibus Objection.

Attached hereto as **Exhibit 22** is a certified translation of the response [ECF No. 17410] (the “Ruíz Díaz Response”), filed by claimant Carmen M. Ruíz Díaz (“Ruíz Díaz”), in response to the Three Hundred Forty-Fifth Omnibus Objection.

Attached hereto as **Exhibit 23** is a certified translation of the response [ECF No. 17442] (the “Ferrer Melendez Response”), filed by claimant Sonia I. Ferrer Melendez (“Ferrer Melendez”), in response to the Three Hundred Forty-Fifth Omnibus Objection.

Attached hereto as **Exhibit 24** is a certified translation of the response [ECF No. 17445] (the “Chevere Fraguada Response”), filed by claimant Zoraida Chevere Fraguada (“Chevere Fraguada”), in response to the Three Hundred Forty-Fifth Omnibus Objection.

Attached hereto as **Exhibit 25** is a certified translation of the response [ECF No. 17614] (the “Roman Ocasio Response”), filed by claimant Carmen Roman Ocasio (“Roman Ocasio”), in response to the Three Hundred Forty-Fifth Omnibus Objection.

Attached hereto as **Exhibit 26** is a certified translation of the response [ECF No. 17485] (the “Response”), filed by Mayra E. Torres Ramos (“Torres Ramos”), in response to (1) the *Three Hundred Forty-Seventh Omnibus Objection (Substantive) of the Commonwealth of Puerto Rico, the Puerto Rico Highways and Transportation Authority, and the Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Misclassified and Overstated Claims*

[ECF No. 17109] (the “Three Hundred Forty-Seventh Omnibus Objection”) and (2) *Three Hundred Fiftieth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, the Puerto Rico Highways and Transportation Authority, and the Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Duplicate Litigation Claims* [ECF No. 17111] (the “Three Hundred Fiftieth Omnibus Objection”).

Attached hereto as **Exhibit 27** is a certified translation of the response [ECF No. 17493] (the “Response”), filed by Luis E. Marcano Garcia (“Marcano Garcia”), in response to the *Three Hundred Forty-Ninth Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico and the Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Duplicate Litigation Claims* [ECF No. 17092] (the “Three Hundred Forty-Ninth Omnibus Objection”).

Attached hereto as **Exhibit 28** is a certified translation of the response [ECF No. 17385] (the “Wilson Crespo Response”), filed by claimant Stephanie H. Wilson Crespo (“Wilson Crespo”), in response to the Three Hundred Fiftieth Omnibus Objection.

Attached hereto as **Exhibit 29** is a certified translation of the response [ECF No. 17406] (the “Cruz Irizarry Response”), filed by claimant Zulma Cruz Irizarry (“Cruz Irizarry”), in response to the *Three Hundred Fifty-First Omnibus Objection (Non-Substantive) of the Commonwealth of Puerto Rico, the Puerto Rico Highways and Transportation Authority, and the Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Partial Duplicate Litigation Claims* [ECF No. 17112] (the “Three Hundred Fifty-First Omnibus Objection”).

Attached hereto as **Exhibit 30** is a certified translation of the response [ECF No. 17435] (the “Rivera Response”), filed by claimant Yolanda Rivera Rivera (“Rivera”), in response to the Three Hundred Fifty-First Omnibus Objection.

Attached hereto as **Exhibit 31** is a certified translation of the response [ECF No. 17497] (the “Ruiz Diaz Response”), filed by claimant Carmen Maria Ruiz Diaz (“Ruiz Diaz”), in response to the Three Hundred Fifty-First Omnibus Objection.

Attached hereto as **Exhibit 32** is a certified translation of the response [ECF No. 18251] (the “Response”), filed by claimant Victor O. Henson Busquets (the “Henson Busquets”), in response to the *Three Hundred Sixty-Fifth Omnibus Objection (Substantive) of the Commonwealth of Puerto Rico to Misclassified and Overstated Claims* [ECF No. 17932] (the “Three Hundred Sixty-Fifth Omnibus Objection”).

Attached hereto as **Exhibit 33** is a certified translation of the response [ECF No. 18107] (the “Gonzalez Response”), filed by claimant Migdalia Gonzalez Vega (“Gonzalez Vega”), in response to the *Three Hundred Sixty-Seventh Omnibus Objection (Non-Substantive) of the Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Incorrect Debtor Claims* [ECF No. 17933] (the “Three Hundred Sixty-Seventh Omnibus Objection”).

Attached hereto as **Exhibit 34** is a certified translation of the response [ECF No. 18070] (the “Gonzalez Velazquez Response”), filed by claimant Agustín González Velázquez (“González Velázquez”), in response to (1) the *Three Hundred Seventy-Fourth Omnibus Objection (Substantive) of the Commonwealth of Puerto Rico, the Puerto Rico Sales Tax Financing Authority, the Puerto Rico Highways and Transportation Authority, the Employees Retirement System of the Government of the Commonwealth of Puerto Rico, and the Puerto Rico Public Buildings Authority to Late-Filed Claims* [ECF No. 17923] (the “Three Hundred Seventy-Fourth

Omnibus Objection") and (2) the *Three Hundred Seventy-Ninth Omnibus Objection (Substantive) of the Commonwealth of Puerto Rico and the Employees Retirement System of the Government of the Commonwealth of Puerto Rico to Partial No Liability Litigation Claims* [ECF No. 17914] (the "Three Hundred Seventy-Ninth Omnibus Objection").

Additional responses that were not filed on the docket, as well as certified translations thereof, are being submitted via notices of correspondence submitted contemporaneously herewith.

Courtesy copies of these certified translations will also be submitted to chambers in the electronic hearing binders the Oversight Board intends to submit on or before January 18, 2022 in compliance with the Adjourned Objection Hearing Procedures Order.

WHEREFORE, the Oversight Board respectfully requests that this Honorable Court take notice of the filing of these responses and certified translations in compliance with the Court's orders.

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Dated: January 5, 2022
San Juan, Puerto Rico

Respectfully submitted,

/s/ Brian S. Rosen

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